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NPDES PERMIT NO. 1I000004*BD, NON-COMPLIANCE REPORT NOS. 90-15 THROUGH 90-18

06/26/90

DOE-1245-90
DOE-FMPC/OEPA
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LETTER

[redacted]

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Department of Energy
FMPC Site Office
P.O. Box 398705
Cincinnati, Ohio 45239-8705
(513) 738-6319

June 26, 1990
DOE-1245-90

Thomas A. Winston, District Chief
Southwest District Office
Ohio Environmental Protection Agency
40 South Main Street
Dayton, OH 45402-2086

Dear Mr. Winston:

NPDES PERMIT NO. 1I000004*BD, NON-COMPLIANCE REPORT NOS. 90-15 THROUGH 90-18

The following text summarizes the April 1990 non-compliances with the Discharge Limitation specified in the FMPC NPDES Permit (No. 1I000004*BD). This table lists the Outfall, date of the non-compliance, parameter, permit limit, and measured effluent concentration.

OUTFALL (NAME AND NUMBER): TOTAL DISCHARGE - 001

Report No.	Date	Parameter	Permit Limit	Actual Measurement
90-15	April 14, 1990	pH (MAX)	9.0 1 hr 0 mins	9.4 4 hrs 0 mins
90-16	April 15, 1990	pH (MAX)	9.0 1 hr 0 mins	9.5 4 hrs 0 mins
90-17	April 15, 1990	pH (MAX)	9.0 1 hr 0 mins	9.2 4 hrs 0 mins
90-18	April 1990	pH (MAX)	7 hrs 28 mins	12 hrs 0 mins

No definitive explanation can be given for the pH non-compliances at Manhole 175 (Outfall 001). The circumstances are very similar to those at the end of March 1990. The East Chamber of the Stormwater Retention Basin was being pumped to the Great Miami River via Manhole 175. The continuous pH discharge monitoring/excursion alarm systems were not in operation. The pH of the process/drinking water has been reduced to less than 9.0; however a similar reduction has not been observed in the FMPC wastewaters. No fire hydrants were flushed during the month of April 1990, and no caustic spills are known to have occurred.

The pH at the SWRB (Outfall 606) never exceeded the discharge limitations in this time frame. It did, however, range from 6.9-8.9 and fluctuated erratically. Adjustments to pH were made without the benefit of continuous monitoring . Lack of continuous monitoring, and having to rely on an instantaneous four-hour readings, hampers the ability to identify and implement corrective action for pH excursions. By using readings taken every four hours it is possible that short duration excursions are being reported as sustained high pH levels for the entire period.

Design deficiencies in the recently installed pH monitoring stations preclude continuous operation. Funds have been authorized and reparations to the system are in progress. As previously reported the total system wide correction has a scheduled completion date of July 1, 1990. Until all corrections have been made pH will be monitored manually twice per shift (six times daily) at each affected outfall. Once the continuous monitoring system is fully operational the pH data will be analyzed, and corrective measures implemented to preclude future non-compliances.

Sincerely,

Gerald W. Westerbeck
FMPC Site Manager

DP-84:Rast

cc:

P. J. Dolan, WMCO
J. R. McDonald, WMCO
G. E. Mitchell, OEPA-Dayton
P. J. Gross, SE-31, ORO